

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

24 cr 326 JRT/ECW

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 2251(a)

v.

18 U.S.C. § 2251(e)

18 U.S.C. § 2253

SAMUEL ERIC SNELL,

18 U.S.C. § 2422(b)

18 U.S.C. § 2428(a)

Defendant.

21 U.S.C. § 853

28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

At times relevant to this Indictment:

1. The defendant, Samuel Eric Snell, resided in the State and District of Minnesota, and was employed at an I.T. Security Firm in Eden Prairie.
2. From in or about October 2022 through December 2022, Snell was a member of an online community on the gaming platform Discord that would offer to sell “services” to adult customers. Specifically, minor girls, referred to as “kittens,” would sell online companionship to adults, referred to as “masters,” on the Discord channel in exchange for monetary payments, usually made through CashApp, or in-kind gifts. Some of these Discord channel names were “Fun Time Kitty Klub,” “Pretty Kitty Hangout,” “Safe Kitten Konnection,” and “Kitten Server Name.”



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3. Although some of the Discord channels publicly prohibited explicit conduct, members of these groups told law enforcement that “not safe for work” (NSFW) requests were made between community members in direct messages.

4. Among others, Snell used the Discord display name “STORM βlackwood#7157” (i.e., “Storm Blackwood”). Snell’s CashApp ID was “\$candymansammn” (i.e., “Candy Man Sam MN”).

5. Records from Snell’s “Storm Blackwood” Discord account showed a large number of direct messages in which Snell solicited from his chat partners—many of whom self-identified as minors—images of themselves.

6. Many of Snell’s minor chat partners shared that they were grappling with gender identity, sexuality, and/or mental health concerns.

7. Snell followed the same general script when soliciting images from these minors. Snell generally began with a solicitation for photos of the minors’ inner thigh and would then specify that he wanted to see the pubic region that is the labia majora. In several instances, Snell progressed to requests for more revealing pictures. In some instances, Snell solicited and received overtly sexually explicit images of self-identified minors in an intent to groom potential victims to eventually produce child pornography.

8. Snell also sent minors electronic sex toys that Snell controlled remotely (also known as “teledildonics”). Snell solicited and received depictions of minors using these devices.

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9. On at least two occasions, Snell took a minor to a hotel where Snell paid the minor \$100 to engage in sexual intercourse. Afterwards, Snell provided the minor with emergency contraception.

COUNTS 1–6
(Production and Attempted Production of Child Pornography)

10. Paragraphs 1–8 are herein realleged and incorporated.

11. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendant,

SAMUEL ERIC SNELL,

attempted to and did knowingly employ, use, persuade, induce, entice, and coerce minors to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by Discord and the internet, to wit:

COUNT	DATE (on or about)	FILE NAME	DESCRIPTION OF FILE
1	10/22/2022	IMG_20221021_233041.jpg	A sexually explicit image depicting Minor Victim A, a pubescent minor assigned female at birth that includes the lascivious display of the minor's genitals and a sexual act.
2	12/13/2022	IMG_0679.mov	A sexually explicit video, approximately 31 seconds in length, depicting Minor Victim A, a pubescent minor assigned female at birth, that includes the lascivious display of the minor's genitals and a sexual act.

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COUNT	DATE (on or about)	FILE NAME	DESCRIPTION OF FILE
3	10/27/2022	ending in 2dce5c.jpg	A sexually explicit image depicting Minor Victim B, a pubescent minor female, that includes a lascivious display of the minor's genitals.
4	10/27/2022	ending in e7ee43.jpg	A sexually explicit image depicting Minor Victim B, a pubescent minor female, that includes a lascivious display of the minor's genitals.
5	10/30/2022	IMG_1957.jpg	A sexually explicit image depicting Minor Victim C, a pubescent minor female, that includes a lascivious display of the minor's genitals.
6	11/14/2022	IMG_2046.jpg	A sexually explicit image depicting Minor Victim C, a pubescent minor female, that includes a lascivious display of the minor's genitals with an object inserted into the vagina.

all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 7

(Persuading or Coercing a Minor to Engage in Prostitution)

12. Paragraphs 1–8 are herein realleged and incorporated.

13. On or about November 8, 2022, in the State and District of Minnesota, the defendant,

SAMUEL ERIC SNELL,

did use a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual who had not attained the age of 18 years, to wit, Minor Victim C, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Juvenile Prostitution, which was a criminal offense under

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Minnesota Statutes § 609.324, subdiv. 1(c)(1), all in violation of Title 18, United States Code, Section 18 U.S.C. § 2422(b).

COUNT 8
(Persuading or Coercing a Minor to Engage in Prostitution)

14. Paragraphs 1–8 are herein realleged and incorporated.

15. On or about December 5, 2022, in the State and District of Minnesota, the defendant,

SAMUEL ERIC SNELL,

did use a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual who had not attained the age of 18 years, to wit, Minor Victim C, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Juvenile Prostitution, which was a criminal offense under Minnesota Statutes § 609.324, subdiv. 1(c)(1), all in violation of Title 18, United States Code, Section 18 U.S.C. § 2422(b).

FORFEITURE ALLEGATIONS

16. If convicted of the offense alleged in Counts 1–6 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

a. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was

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produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to digital devices that may be seized from the defendant's person or property at the time of his arrest and are traceable to Counts 1–6.

16. Upon conviction of Counts 7 or 8 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428(a)(2), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of [Titles 18, United States Code, Section 2422(b). The defendant shall also forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a)(1), any property used, or intended to be used, to commit or facilitate the commission of such violations.

17. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON